

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SYNOPSYS, INC.,)	
a Delaware corporation,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 05-701 (GMS)
)	
MAGMA DESIGN AUTOMATION,)	
a Delaware corporation,)	
)	
Defendant.)	

SECOND AMENDED FINAL JOINT CLAIM CONSTRUCTION CHARTS

MORRIS, NICHOLS, ARSHT & TUNNELL LLP
Jack B. Blumenfeld (#1014)
Karen Jacobs Loudon (#2881)
Leslie A. Polizoti (#4299)
1201 N. Market Street
P.O. Box 1347
Wilmington, DE 19899-1347
(302) 658-9200
Attorneys for Plaintiff Synopsys, Inc.

FISH & RICHARDSON P.C.
William J. Marsden, Jr. (#2247)
Kyle Wagner Compton (#4693)
919 N. Market Street
P.O. Box 1114
Wilmington, DE 19899
(302) 652-5070
*Attorneys for Defendant Magma
Design Automation, Inc.*

November 28, 2006

The parties have met and conferred, and present the following *Second* Amended Joint Claim Construction Charts.

I. STIPULATED CONSTRUCTIONS

During the meet and confer process, the parties have agreed upon the constructions set forth in **Exhibit A** for U.S. Patent No. 6,192,508 (“the ‘508 Patent”), U.S. Patent No. 6,505,328 (“the ‘328 Patent”), U.S. Patent No. 6,519,745 (“the ‘745 Patent”), U.S. Patent No. 6,857,116 (“the ‘116 Patent”), and U.S. Patent No. 6,854,093 (“the ‘093 Patent”).

II. CLAIM TERMS REQUIRING CONSTRUCTION BY THE COURT

The parties’ *Second* Amended Joint Claim Construction Charts for the ‘508 Patent, the ‘745 Patent, and the ‘116 Patent are attached hereto as **Exhibits B, C, and D**, respectively. Each chart identifies the disputed claim terms in each patent, each party’s proposed construction for the disputed claim terms, and each party’s identification of the intrinsic and/or extrinsic evidence supporting its proposed construction.

This Second Amended Joint Claim Construction Chart differs from the Amended Chart submitted on November 3, 2006 in the following respects:

- Exhibit A has been modified to reflect the parties’ agreement on the construction of the terms “limits” from the ‘508 Patent and “buckets” from the ‘745 Patent, and Exhibits B and C (pertaining to disputed terms) have been modified to delete these terms.
- The parties have modified the proposed constructions for “reducing constraints on a subsequent placement step” in the ‘508 Patent (see Exhibit B).

- There have been no changes to Exhibit D.

The parties jointly and respectfully request that, if the Court deems it appropriate, the Court include the list of agreed upon claim term constructions attached as Exhibit A in the ultimate claim construction order. In the alternative, the parties agree that this list of agreed-upon claim terms and constructions be considered a binding stipulation between the parties.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Leslie A. Polizoti

Jack B. Blumenfeld (#1014)
Karen Jacobs Loudon (#2881)
Leslie A. Polizoti (#4299)
1201 N. Market Street
P.O. Box 1347
Wilmington, DE 19899-1347
(302) 658-9200
Attorneys for Plaintiff Synopsys, Inc.

FISH & RICHARDSON P.C.

/s/ Kyle Wagner Compton

William J. Marsden, Jr. (#2247)
Kyle Wagner Compton (#4693)
919 N. Market Street
P.O. Box 1114
Wilmington, DE 19899
(302) 652-5070
*Attorneys for Defendant Magma
Design Automation, Inc.*

OF COUNSEL:

James J. Elacqua
Valerie M. Wagner
DECHERT LLP
1117 California Avenue
Palo Alto, CA 94304
(650) 813-4848

George G. Gordon
DECHERT LLP
Cira Center
2929 Arch Street
Philadelphia, PA 19104-2808
(215) 261-2382

Rebecca P. Dick
DECHERT LLP
1775 Eye Street, N.W.
Washington, DC 20006-2401
(202) 261-3432

OF COUNSEL:

FISH & RICHARDSON P.C.
Katharine Kelley Lutton
Tamara Fraizer
500 Arguello Street, Suite 500
Redwood City, CA 94063
(650) 839-5070

James Pooley
L. Scott Oliver
POOLEY & OLIVER LLP
Five Palo Alto Square, 7th Floor
Palo Alto, CA 94306-2121
(650) 739-7020

November 28, 2006

547164